

EXHIBIT B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ERIC YOUNG, ADAM KURTZ, and
DAVID CRYSTAL on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

IFINEX INC., BFXNA INC., BFXWW
INC., TETHER HOLDINGS LIMITED;
TETHER LIMITED; DIGFINEX INC.,
TETHER OPERATIONS LIMITED,
TETHER INTERNATIONAL LIMITED,
AND JOHN DOES 1-50,

Defendants.

No. 20 Civ. 00169
ECF Case

DAVID LEIBOWITZ, BENJAMIN
LEIBOWITZ, JASON LEIBOWITZ,
AARON LEIBOWITZ, and PINCHAS
GOLDSHTEIN

Plaintiffs,

v.

IFINEX INC., BFXNA INC., BFXWW
INC., TETHER HOLDINGS LIMITED,
TETHER OPERATIONS LIMITED,
TETHER LIMITED, TETHER
INTERNATIONAL LIMITED, DIGFINEX
INC., PHILIP G. POTTER, GIANCARLO
DEVASINI, LUDOVICUS JAN VAN DER
VELDE, REGINALD FOWLER, CRYPTO
CAPITAL CORP., and GLOBAL TRADE
SOLUTIONS AG,

Defendants.

No. 19 Civ. 09236
ECF Case

RADICE LAW FIRM, PC
FIRM RESUME AND BIOGRAPHIES

THE RADICE LAW FIRM, PC

The Radice Law Firm was founded in 2012 to prosecute antitrust, False Claims Act, and other complex litigation. Attorneys at the firm have extensive experience in health care, finance, and other highly regulated industries and are involved in all aspects of litigation, from initial case investigation through trial. We offer top-quality work, performed efficiently, while giving our clients the dedication and attention they deserve.

The Radice Law Firm has had a significant role in numerous class actions that have resulted in substantial recoveries for the class, including:

- *In re Foreign Exchange* (\$2.3 billion in settlements for the class);
- *In re Loestrin FE Antitrust Litigation*, No. 13-md-2472 (D.R.I.) (direct purchaser class to share in pending \$300 million settlement);
- *In re Lidoderm Antitrust Litigation*, No. 14-2521 (N.D. Ca.) (\$166 million settlement for direct purchasers in case alleging that Endo and Teikoku unlawfully paid Watson to delay the launch of a generic Lidoderm pain relief patch);
- *In re Celebrex Antitrust Litigation*, No. 14-361 (E.D. Va.) (\$94 million settlement in case alleging that Pfizer engaged in fraud before the Patent Office in securing patent protection for its blockbuster pain drug);
- *In re Dental Supplies Antitrust Litigation*, No. 16-696 (E.D.N.Y.) (\$80 million settlement for the class; filed first case and appointed liaison counsel in case alleging nationwide margin-fixing conspiracy among distributors of dental supplies); and
- *In re Solodyn (minocycline hydrochloride) Antitrust Litigation*, No. 14-2503 (D. Mass.) (\$74 million in settlements with four pharmaceutical companies on behalf of direct purchasers in case alleging reverse payments and sham litigation to delay generic entry).

Many of the firm's class actions involve allegations of market manipulation in the financial industry. They include:

- *In re Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 13-7789 (S.D.N.Y.) (case alleging that major banks colluded to manipulate foreign exchange rates);
- *In re Mexican Government Bonds Antitrust Litigation*, No. 18-2830 (S.D.N.Y.) (case alleging that major banks colluded to rig bond auctions, inflate resale prices, and widen bid-ask spreads);
- *In re Treasury Securities Auction Antitrust Litigation*, No. 15-2673 (S.D.N.Y.) (case alleging market manipulation by major banks in the auction market for U.S. treasury securities); and
- *Anastasio, et al. v. Total Gas & Power North America, Inc., et al.*, No. 15-9689 (S.D.N.Y.) (case alleging that Total Gas' traders made manipulative trades at thinly-traded regional hubs in order to move the prices of derivative instruments whose values were tied to the price at those hubs).

The firm has also been instrumental in developing new cases. In the *Dental Supplies* case, mentioned above, the firm, with co-counsel, investigated and filed the first complaint alleging a

years-long conspiracy to fix margins in the market for dental supplies. Over sixty law firms subsequently filed similar cases. John Radice was appointed liaison counsel in that litigation. In June of 2019, the Honorable Brian M. Cogan, U.S. District Judge for the Eastern District of New York, granted final approval to an \$80 million settlement in that case. In approving the settlement and fee application, Judge Cogan stated, “This is a substantial recovery that has the deterrent effect that class actions are supposed to have, and I think it was done because we had really good Plaintiffs’ Lawyers in this case who were running it. . . . The class reaction, as I have alluded to, also strikes me of weighing in favor of approving settlement. Notice to 200,000 class members, four opt-outs, you know, *that is about as good as it gets.*”

Today, the Radice Law Firm has grown to include nine full-time attorneys from top law schools including Harvard, N.Y.U., and the University of Pennsylvania. Biographies of the firm’s attorneys follow.

JOHN RADICE

John Radice founded the Radice Law Firm in 2012 and has been practicing complex antitrust litigation on behalf of plaintiffs for over a dozen years. He graduated from Princeton University, and prior to attending law school, he worked at a major investment bank as a bond trader, giving him a deep familiarity with complex trading and financial markets. He attended New York University School of Law, where he was a Hays Fellow. After law school, he clerked for Judge Edith Brown Clement in the United States Court of Appeals for the Fifth Circuit, and then worked for some of the largest plaintiffs' antitrust firms in the country. He has been recognized by Super Lawyers beginning in 2011, first as a "Rising Star" (an honor received by no more than 2.5% of lawyers in the state) and then as a "Super Lawyer."

Mr. Radice has served as lead or co-lead counsel in the following class actions:

- *Filannino-Restifo v. TD Bank, N.A.*, No. 16-2374 (D.N.J.) (co-lead counsel in case alleging undercounting by a bank's coin-counting machines; assisted in achieving a favorable settlement for the class that received final approval from the court);
- *Chepiga, et al. v. Conair Corp.*, No. 16-12399 (D.N.J.) (complaint against Conair Corporation alleging consumer fraud in its recall of chopping blades from its Cuisinart food processor products, was appointed lead counsel, and efficiently negotiated a favorable settlement for the class that received final approval from the court); and
- *RXDN, Inc. v. Novartis Pharms. Corp., Novartis, AG, and Novartis Corp.*, No. 16-12399 (D. Mass.) (lead counsel in antitrust class action alleging an anticompetitive scheme to delay generic competition for Gleevec, a drug used to treat chronic myeloid leukemia and other conditions).

Mr. Radice also served as part of the litigation and trial teams in many other cases that resulted in substantial class recoveries, including:

- *United States ex rel. Piacentile v. Bristol-Myers Squibb Co.* (\$515 million qui tam settlement related to unlawful promotion of Abilify);
- *In re Loestrin 24 FE Antitrust Litig.*, Case No. 1:13-md-02472, (D.R.I) (pending \$300 million settlement to resolve a class action lawsuit over delayed generic entry of oral contraceptive Loestrin 24 Fe).
- *In re Tricor Direct Purchaser Antitrust Litig.* (\$250 million settlement after the start of trial in case alleging delayed entry of generic versions of Tricor);
- *In re Flonase Direct Purchaser Antitrust Litig.* (\$150 million settlement on the eve of trial in case alleging sham citizen petitioning to delay generic entry);
- *In re Neurontin Marketing & Sales Litig.* (resulting in a RICO jury verdict statutorily trebled to over \$142 million for the unlawful and fraudulent promotion of Neurontin);
- *In re Dental Supplies Antitrust Litig.*, No. I :16-cv-00696-BMC-GRB (E.D.N.Y.) (\$80 million settlement in case alleging nationwide margin fixing conspiracy among dental suppliers);
- *In re Puerto Rico Cabotage Antitrust Litig.* (\$52.25 million cash settlement plus price freeze option following alleged price fixing and market allocation);

- *In re Norvir Direct Purchaser Antitrust Litig.* (\$52 million settlement following three days of trial in case alleging anticompetitive bundling of Norvir and Kaletra);
- *United States ex rel. Marchese v. Cell Therapeutics, Inc.* (\$10.5 million qui tam settlement stemming from unlawful marketing of Trisonex).

Mr. Radice, either alone or with co-authors, frequently publishes articles on current topics in antitrust and False Claims Act law, including:

- “Where do we go now? The Hatch-Waxman Act 25 Years Later: Successes, Failures, and Prescriptions for the Future,” 41 Rutgers L. J. 229 (Fall 2009 & Winter 2010);
- “The False Claims Act: A Public-Private Partnership” in Volume II, in AAJ 2009 Annual Convention: AAJ Education Reference Materials 1497 (Jennifer Adams ed., 2009); and
- “Daubert and Rule 702 in the Context of Antitrust Economic Experts: A Practitioner’s Guide,” Daubert 15 Years Later: How Have Economists Fared (ABA Spring Meeting 2009).

A. LUKE SMITH

Attorney A. Luke Smith joined the Radice Law Firm as an associate in May 2014. Mr. Smith has considerable experience litigating all phases of complex antitrust class actions, from prefiling investigations through post-trial briefing. Throughout his career, Mr. Smith has had the privilege of working alongside the nation's most preeminent plaintiffs law firms and lawyers, and has been part of the litigation or trial teams in, inter alia, the following cases:

- *In re Metoprolol Succinate Direct Purchaser Antitrust Litig.*, 06-52 (D. Del.) (\$20 million settlement in case challenging Astra-Zeneca conduct to delay generic entry);
- *In re Wellbutrin XL Antitrust Litig.*, No. 08-2431 (E.D. Pa.) (\$37.5 million partial settlement in case challenging the conduct of SmithKline Beecham Corp. and Biovail Laboratories in delaying generic drug competition);
- *In re Prandin Direct Purchaser Antitrust Litig.*, 10-12141AC-DAS (E.D. Mich. (\$19 million settlement in case challenging Novo Nordisk's conduct to delay generic entry);
- *Marchese v. Cablevision Systems Corp.*, 2:10-cv-02190 (D.N.J.) (accusing Cablevision of illegally tying two-way cable services to rentals of a Cablevision-supplied set-top box);
- *In re Skelaxin (metaxalone) Direct Purchaser Antitrust Litig.*, 12-2343 (E.D. Tenn.) (\$73 million settlement in case alleging delayed generic entry);
- *In re Nexium (Esomeprazole) Antitrust Litig.*, 1: 12-md-02409 (D. Mass.) (\$24 million partial mid-trial settlement in "pay-for-delay" case challenging agreements between AstraZeneca and generic competitors to delay generic entry);
- *Smith v. FDA*, 12-5141 (pro se case challenging FDA’s public disclosure policies under FOIA);
- *In re Solodyn Antitrust Litig.*, No. 14-10438 (D. Mass.) (alleging that Medicis engaged in an anticompetitive scheme to delay generic competition);

- *In re Lidoderm Antitrust Litig.*, No. 14-2521 (N.D. Cal.) (alleging that Endo paid its generic competitor, Watson (now known as Actavis), to delay generic versions of Lidoderm); and
- *In re Capacitors Antitrust Litig.*, No. 3:14-Cv-03264-Jd (N.D. Cal.) (alleging manufacturers of capacitors (ubiquitous components found in virtually every electronic device) conspired to inflate capacitor prices).

Mr. Smith recently co-authored an article on abusive “life cycle management” practices in the pharmaceutical industry, “Life Cycle Management: The Courts Examine Brand Strategies to Defend Blockbuster Franchises” (ABA Antitrust Law Division, 63rd Spring Meeting, April 15-17, 2015). Mr. Smith earned his J.D. from Pennsylvania State University Dickinson School of Law (2010), and graduated summa cum laude from Cheyney University of Pennsylvania with a degree in Business Management (2007). While in law school, Mr. Smith was certified as a Miller Center Public Interest Advocate in recognition of his service at the Family Law Clinic, and competed in the American Constitution Society Constance Baker Motley National Moot Court Competition. Mr. Smith has completed internships for the Honorable Joseph A. Greenaway, then of the United States District Court for the District of New Jersey, the New Jersey Office of the Public Defender, and at the Pennsylvania Attorney General, Bureau of Consumer Protection.

Mr. Smith also devotes significant energy serving his community, and in 2012 co-founded Germantown United CDC (a 501(c)(3) non-profit organization revitalizing Germantown's business corridors through a community-driven approach to economic development), where he currently serves as secretary of the board and a member of the executive committee. He is also a board member of the Ebenezer Maxwell Mansion (an authentically restored Victorian house museum in Philadelphia), and is V.P. and Chair of the Zoning Committee for WCGN (neighborhood civic association and RCO representing Tulpehocken Historic Station District). Mr. Smith also serves as Democratic Committee Person for Philadelphia's 59th Ward, 22 Division, after his public election to that post in 2014.

Mr. Smith is licensed to practice in Pennsylvania and New Jersey has been admitted to the United States District Courts for the Eastern District of Pennsylvania and the District of New Jersey.

KENNETH PICKLE

Kenneth Pickle has been an associate with the Radice Law Firm since 2013. Prior to law school, he was an analytical chemist for a large pharmaceutical company. His litigation experience includes representing plaintiffs in all phases of litigation, including case evaluation and assessment, development of case strategy, all phases of discovery, trial strategy development, and trial. He has been part of the litigation or trial teams in numerous class actions against pharmaceutical companies alleging anticompetitive delayed-generic entry business practices, including:

- *In re Skelaxin (Metaxalone) Direct Purchaser Antitrust Litig.*, 12-2343 (E.D. Tenn.) (\$73 million settlement in case alleging delayed generic entry);

- *In re Nexium (Esomeprazole) Antitrust Litig.*, 1 :12-md-02409 (D. Mass.) (\$24 million partial mid-trial settlement in "pay-for-delay" case challenging agreements between AstraZeneca and generic competitors to delay generic entry);
- *In re Solodyn Antitrust Litig.*, No. 14-10438 (D. Mass.) (alleging that Medicis engaged in an anticompetitive scheme to delay generic competition).

Mr. Pickle also has experience litigating class action antitrust cases in the financial trading, telecommunication, and dental supplies industries. Mr. Pickle graduated from Cardozo Law School in 2011, where he served as associate editor for the Cardozo Journal of International and Comparative Law. He is admitted to the bar of the State of New York, as well as the U.S. District Courts for the Southern District of New York and Eastern District of New York. He is also a registered patent attorney with the U.S. Patent and Trademark Office.

APRIL D. LAMBERT

April D. Lambert joined the Radice Law Firm as of counsel in June 2016. Prior to joining the Radice Law Firm, Ms. Lambert was an associate in the intellectual property litigation group at Sidley Austin LLP. Ms. Lambert has extensive experience litigating patent infringement and antitrust cases, as well as handling other intellectual property matters. Ms. Lambert has also participated on the discovery teams of a range of litigation matters. Representative cases Ms. Lambert has worked on including the following:

- *In re Loestrin 24 FE Antitrust Litig.*, Case No. 1:13-md-02472, (D.R.I) (pending \$300 million settlement in case alleging delayed generic entry of prescription drug Loestrin FE due to product hopping and other anticompetitive conduct by defendant);
- *In re Asacol Antitrust Litig.* (D. Mass.) (alleged delayed generic entry of prescription drug Asacol due to product hopping and other anticompetitive conduct by defendant; favorable settlement reached);
- *In re Niaspan Antitrust Litig.* (E.D. Pa.) (alleging delayed generic entry of prescription drug Niaspan due to reverse payments and other anticompetitive conduct by defendant);
- *In re Solodyn Antitrust Litig.*, No. 14-10438 (D. Mass.) (\$76.8 million settlement in case alleging that Medicis engaged in an anticompetitive scheme to delay generic competition);
- *Cung Le et al. v. Zuffa* (D. Nev.) (case alleging unlawfully depressed compensation for MMA fighters caused by UFC's monopolization of the market and anticompetitive practices);
- *Medtronic AVE, Inc. v. Cordis Corp.* (E.D. Tex) (patent infringement litigation case involving balloon stent catheters; favorably settled on eve of pre-trial conference);
- *SynQor, Inc. v. Artesyn* (E.D. Tex.) (patent infringement litigation case involving power converters);
- *Celgene Corp. v. Natco Pharma Ltd.* (D.N.J.) (patent infringement case involving the drug lenalidomide).

Ms. Lambert earned her J.D. from the New York University School of Law (2003), where she was a McKay Scholar, an award given to the top 25% of the class, and was the

Executive Editor of the *N.Y.U. Journal of Legislation and Public Policy*. While at NYU, Ms. Lambert served as an intern for the New York City Public Advocate's Office. Ms. Lambert also graduated Phi Beta Kappa from Johns Hopkins University (2000) and earned a masters in library and information science from the University of Illinois (2013). Ms. Lambert has published on the topics of cybersecurity education and library patron privacy. While a graduate student, Ms. Lambert conducted ethnographic and survey research into the adoption and use of cryptocurrencies and the sociopolitical characteristics of Bitcoin users.

Throughout her career Ms. Lambert has been active in pro bono matters. In law school she volunteered as a student advocate for women through a battered women's program and assisted women in obtaining divorces. Ms. Lambert continued this work once in practice and served as counsel for petitioners for protection from abuse orders, often negotiating consent orders and avoiding the trauma of a hearing on the matter. Ms. Lambert also served as an intake coordinator for the Chicago Volunteer Legal Services (CVLS) Hull House Legal Clinic and earned awards for exemplary service to the CVLS program.

Ms. Lambert is admitted to practice in Illinois and Pennsylvania (inactive) and has been admitted to the United States District Courts for the Northern District of Illinois and the Western District of Pennsylvania.

DANIEL RUBENSTEIN

Daniel Rubenstein began work with the Radice Law Firm in March 2016, and became of counsel to the firm in June 2016. Mr. Rubenstein is an experienced litigation attorney who has handled complex cases in both federal and state courts. Mr. Rubenstein practiced for more than five years as a litigator with the New York-based plaintiff's firm LeBow & Associates, handling primarily civil rights and constitutional cases. His practice included cases involving discrimination and harassment on the basis of race, gender, and sexual orientation; wrongful imprisonment; excessive force; and retaliation against whistleblowers. During that time, he achieved numerous settlements for clients, had multiple cases receive media coverage, and drafted three appeals to the Second Circuit.

Prior to Mr. Rubenstein's experience with LeBow & Associates, he practiced corporate law. He worked with New York law firms Feldman, Weinstein & Smith and Mintz & Fraade, working on transactions including mergers, joint ventures, technology licensing, and reverse mergers, and on securities offerings and SEC reporting. A significant part of his practice with those firms involved the representation of emerging technology companies. He also worked in Tokyo, Japan with the Japanese law firms Blakemore & Mitsuki and Nagashima & Hashimoto, assisting both Japanese companies and foreign companies doing business in Japan, and working on English language contracts and cross-border transactions.

Mr. Rubenstein earned his J.D. from Harvard Law School in 2000, and graduated magna cum laude from Carleton College in 1997 with a B.A. in Economics, where he was named to Phi Beta Kappa and also to the Dean's List for 1994-6. He also studied biology, organic chemistry, and biochemistry at West Virginia State University and Marshall University, and uses that background to assist with scientific issues in his legal practice. Mr. Rubenstein is admitted to

practice in New York and Texas (currently inactive in Texas), and in the Southern and Eastern Districts of New York.

NATASHA FERNANDEZ-SILBER

Natasha Fernandez-Silber joined the Radice Law Firm in 2018. She is an experienced litigator who started her career in the Restructuring and Finance Group at the law firm Wachtell, Lipton, Rosen & Katz in New York City, where she represented clients on issues relating to bankruptcy, insolvency and creditors' rights.

Her practice now focuses on class action antitrust actions. At the Radice Law firm, she has taken an active role in many cases, including three class actions against Burger King, H&R Block, and Papa John's on behalf of workers from those companies' franchises who are challenging no-poach provisions in those companies' franchise agreements that prevent franchises from hiring workers from other franchises in the chain, alleging that practice has depressed wages. She is also on the litigation team for *In re Intuniv Antitrust Litigation*, No. 16-12653 (D. Mass.) (alleging delayed generic entry).

Ms. Fernandez-Silber has a B.A. and M.A. from Yale University, and earned her J.D. from New York University School of Law, where she was a member of the Law Review. She clerked for the Honorable Ann Claire Williams (ret.) of the Seventh Circuit Court of Appeals. She is admitted to practice in New York and Michigan.

CLARK CRADDOCK

Clark Craddock began work with the Radice Law Firm in 2016. Prior to joining the Radice Law Firm, Ms. Craddock worked for more than nine years as an attorney in the New York office of Jones Day, where she primarily practiced intellectual property law. Her practice included cases concerning patent infringement, trademark infringement and unfair trade practices. Ms. Craddock also worked in the San Francisco office of Quinn Emanuel Urquhart & Sullivan, where she continued to practice intellectual property law before joining the Radice Law Firm.

Her practice now focuses on class action antitrust actions. She is currently a member of the litigation team for *In re Intuniv Antitrust Litigation*, 16-cv-12653 (D. Mass.) (alleging that Shire and Actavis anticompetitively delayed entry of a generic version of Shire's ADHD drug).

Ms. Craddock earned her J.D. from the University of Pennsylvania Law School in 2004. She received a B.S. in Biology from the College of William and Mary. She then earned her Ph.D. in Ecology and Evolution from Rutgers University with research examining on the genetic relationships among molluscan species at deep-sea hydrothermal vents and cold-water seeps.

Prior to law school, Ms. Craddock taught undergraduate and graduate science courses at the University of South Florida. Ms. Craddock is admitted to practice in New York, New Jersey and California, and in the Southern District of New York.

RISHI RAITHATHA

Rishi Raithatha joined the Radice Law Firm in 2016. Prior to joining, Mr. Raithatha was an associate at a small firm specializing in the needs of technology entrepreneurs. Mr. Raithatha also has experience managing complex electronic discovery projects. Representative cases Mr. Raithatha has worked on include the following:

- *Cung Le et al. v. Zuffa* (D. Nev.) (monopsony case alleging unlawfully depressed compensation for MMA fighters caused by UFC's monopolization of the market)
- *In Re: Domestic Antitrust Litigation* (D.C. Cir.) (alleging major airlines and co-conspirators conspired to raise domestic airfare prices through agreements to limit capacity)
- *In re Solodyn Antitrust Litig.*, No. 14-10438 (D. Mass.) (alleging that Medicis engaged in an anticompetitive scheme to delay generic competition)

Mr. Raithatha graduated with his J.D. from the New York University School of Law (2013), where he completed substantial public interest and human rights work in New Orleans and Cape Town through NYU's Global Justice Clinic. Mr. Raithatha graduated with honors from The George Washington University (2009) with degrees in Art History and American Studies. Before law school, Rishi worked at several international nonprofits, as well as art museums and auction houses. He remains committed to social justice and pro bono work.

EVA KANE

Ms. Kane began work with the Radice Law Firm in 2013 and currently serves as of counsel to the firm. She has substantial experience conducting and managing both plaintiffs' and defendants' discovery and has served important roles in, inter alia, the *Capacitors*, *Skelaxin*, *Suboxone*, and *Foreign Exchange* litigations. Ms. Kane has been involved for years with pharmaceutical patent litigation and technology patent litigation, as well as intellectual property matters and mergers. Prior to that, Ms. Kane represented both plaintiffs and defendants in her personal practice, in which she handled successfully personal injury cases from inception to jury verdicts as well as immigration cases and small claims matters.

Ms. Kane earned her J.D. from Jacob D. Fuchsberg Law Center and graduated as an honor student in the top 25% of her class. Ms. Kane was a member of the Transnational Journal and interned for Judge Doyle in the New York State Supreme Court and Judge Conte in Superior Court, Hackensack, NJ. She is admitted to practice law in the States of New York and New Jersey, and in Federal Courts in the Eastern and Southern Districts of New York and the District Court of New Jersey.

ERIC BLANCO

Mr. Blanco had been working with Radice Law Firm since 2016. He has over a decade of discovery expertise, having managed and worked on a number of large scale electronic document reviews in many areas of law including securities fraud, patent infringement and pharmaceutical cases. Mr. Blanco has extensive knowledge of both the legal and technical aspects of the

discovery process, and has made significant contributions while working on a number of large scale plaintiff-side litigations involving financial instruments. In addition to identifying case-critical documents, his work has been instrumental in the drafting of complaints and motions as well as in preparing for witness depositions and potential trials. Mr. Blanco graduated from Fordham University School of Law in 2005 and was admitted to practice in New York State in 2006. He is a 2001 graduate of Boston College.